

Jan D. Sokol, OSB #780873
jdsokol@lawssl.com
Mario R. Nicholas, OSB #141663
mnicholas@lawssl.com
STEWART SOKOL & LARKIN LLC
2300 SW First Avenue, Suite 200
Portland, OR 97201-5047
Telephone: (503) 221-0699
Facsimile: (503) 223-5706

Attorneys for Plaintiff Alliance Industrial Group, Inc.

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

ALLIANCE INDUSTRIAL GROUP, INC., an
Oregon corporation,

Plaintiff,

v.

TURNER CONSTRUCTION COMPANY, a
New York corporation; and LIBERTY
MUTUAL INSURANCE COMPANY, a
Massachusetts corporation,

Defendants.

Case No. 3:15-cv-00736-HZ

**JOINT STIPULATION AND ORDER
FOR DISMISSAL WITH PREJUDICE**

The parties to this action, by and through counsel, and pursuant to Federal Rules of Civil Procedure 41(a)(1)(A)(ii) hereby stipulate to the dismissal with prejudice of this action, including all claims and counterclaims stated herein against all parties, with each

///

///

///

JOINT STIPULATION AND ORDER FOR DISMISSAL
WITH PREJUDICE - 1

STEWART SOKOL & LARKIN LLC
ATTORNEYS AT LAW
2300 SW First Avenue, Suite 200
Portland, OR 97201-5047
(503) 221-0699
FAX (503) 223-5706

party to bear its own attorneys' fees and costs.

DATED this 23rd day of May, 2018.

STEWART SOKOL & LARKIN LLC

CANN LAWYERS, P.C.

By: s/ Mario R. Nicholas
Jan D. Sokol, OSB #780873
jdsokol@lawssl.com
Mario R. Nicholas, OSB #141663
mnicholas@lawssl.com
*Attorneys for Plaintiff Alliance
Industrial Group, Inc.*

By: s/ Frederic E. Cann
Frederic E. Cann, OSB #781604
fcann@fcann.com
*Attorneys for Defendants Turner
Construction Company and Liberty
Mutual Insurance Company*

ORDER

The stipulation is approved. The entire action, including all claims and counterclaims stated herein against all parties, is hereby dismissed with prejudice, with each party to bear its own attorneys' fees and costs.

DATED this ____ day of _____, 2018

Honorable Judge Marco A. Hernandez

SUBMITTED BY: s/ Mario R. Nicholas
Jan D. Sokol, OSB #780873
jdsokol@lawssl.com
Mario R. Nicholas, OSB #141663
mnicholas@lawssl.com
STEWART SOKOL & LARKIN LLC
2300 SW First Avenue, Suite 200
Portland, OR 97201-5047
Telephone: (503) 221-0699
Attorneys for Plaintiff Alliance Industrial Group, Inc.

JOINT STIPULATION AND ORDER FOR DISMISSAL
WITH PREJUDICE - 2

STEWART SOKOL & LARKIN LLC
ATTORNEYS AT LAW
2300 SW First Avenue, Suite 200
Portland, OR 97201-5047
(503) 221-0699
FAX (503) 223-5706

CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing **JOINT STIPULATION AND ORDER FOR DISMISSAL WITH PREJUDICE** on:

Mr. Frederic E. Cann
Cann Lawyers PC
620 SW Main Street, Suite 205
Portland, OR 97205
E-mail: fcann@fcann.com
Phone: (503) 228-6529
Fax: (503) 228-6529
*Attorneys for Defendants Turner
Construction Company and Liberty
Mutual Surety*

Mr. Ronald L. Helmuth
Peckar & Abramson, P.C.
1875 Century Park East, Suite 550
Los Angeles, CA 90067
E-mail: rhelmuth@pecklaw.com
Phone: (310) 228-1075
Fax: (310) 228-1076
*Attorneys for Defendants Turner
Construction Company and Liberty Mutual
Surety*

by the following indicated method or methods:

☒ by **E-filing** a full, true and correct copy thereof to the attorney, as shown above, at the electronic mail address reflected on the court's CM/ECF system, on the date set forth below.

DATED this 23rd day of May, 2018.

STEWART SOKOL & LARKIN LLC

By: s/ Mario R. Nicholas
Mario R. Nicholas, OSB #141663
mnicholas@lawssl.com
*Attorneys for Plaintiff Alliance Industrial
Group, Inc.*